

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

LANDWORKS CREATIONS, LLC,)	
Plaintiff,)	
v.)	
UNITED STATES FIDELITY AND)	C.A. No. 4:05-CV-40072-FDS
GUARANTY COMPANY, and)	
LOVETT SILVERMAN CONSTRUCTION)	
CONSULTANTS, INC.)	
Defendants.)	

**UNITED STATES FIDELITY AND GUARANTY COMPANY’S
MOTION FOR JURY VOIR DIRE**

The Defendant, United States Fidelity and Guaranty Company (“USF&G”), requests that the following questions be posed to the jurors upon *Voir Dire*. The appropriate follow-up questions can be asked individually of any jurors responding affirmatively to any of the questions asked below.

1. Landworks Creations, LLC is the plaintiff in this case. Have you, a family member, friend or acquaintance ever worked for this company?
2. USF&G is the defendant in this case. Have you, a family member, friend or acquaintance ever worked for this company?
3. Have you, a family member, friend or acquaintance ever worked for a company involved in the construction industry?
4. Have you, a family member, friend or acquaintance ever worked as or for a subcontractor on a public construction project?
5. Have you, a family member, friend or acquaintance ever worked as or for a general contractor on a public construction project?
6. Have you, a family member, friend or acquaintance every worked for an insurance company.

7. Are there any among you who bear a grudge or have feelings against construction companies or who feel that construction companies should be treated differently than natural persons or other corporations in a court of law?
8. Are there any among you who bear a grudge or have feelings against insurance companies or who feel that insurance companies should be treated differently than natural persons or other corporations in a court of law?
9. Do you believe that you will be unable to decide any issues presented in this case in a fair and impartial manner for any reason whatsoever?

Respectfully submitted,
**UNITED STATES FIDELITY &
GUARANTY COMPANY,**
By its attorneys,

/s/ Peter G. Hermes

Peter G. Hermes, BBO No. 231840
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& SPEARING, P.C.

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Date: May 13, 2008

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 13, 2008.

/s/ Peter G. Hermes

Peter G. Hermes